

**BOIES SCHILLER FLEXNER LLP**

David Boies (*pro hac vice*)  
333 Main Street  
Armonk, NY 10504  
(914) 749-8200  
dboies@bsfllp.com

Maxwell V. Pritt (SBN 253155)  
Joshua M. Stein (SBN 298856)  
44 Montgomery Street, 41st Floor  
San Francisco, CA 94104  
(415) 293-6800  
mpritt@bsfllp.com  
jstein@bsfllp.com

Jesse Panuccio (*pro hac vice*)  
1401 New York Ave, NW  
Washington, DC 20005  
(202) 237-2727  
jpanuccio@bsfllp.com

Joshua I. Schiller (SBN 330653)  
David L. Simons (*pro hac vice*)  
55 Hudson Yards, 20th Floor  
New York, NY 10001  
(914) 749-8200  
jischiller@bsfllp.com  
dsimons@bsfllp.com

*Counsel for Plaintiffs*

[Additional Counsel Listed on Signature Page]

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

RICHARD KADREY, *et al.*,  
  
Individual and Representative Plaintiffs,  
  
v.  
  
META PLATFORMS, INC., a Delaware  
corporation;  
  
Defendant.

Case No. 3:23-cv-03417-VC

**STIPULATION AND ~~PROPOSED~~ ORDER RE  
OMNIBUS DISCOVERY LETTER BRIEF**

1 Pursuant to Civ. L.R. 7-12, Plaintiffs Richard Kadrey, Sarah Silverman, Christopher  
2 Golden, Jacqueline Woodson, Andrew Sean Greer, Rachel Louise Snyder, David Henry Hwang,  
3 Ta-Nehisi Coates, Laura Lippman, Matthew Klam, Junot Díaz, Lysa Terkeurst and Christopher  
4 Farnsworth (“Plaintiffs”); and Defendant Meta Platforms, Inc. (“Defendant”) (collectively, the  
5 “Parties”) by and through their respective counsel stipulate to the following:

6 WHEREAS, the Court entered an Order extending the deadline for raising issues regarding  
7 existing written discovery to November 8, 2024, Dkt. No. 258; and

8 WHEREAS, Plaintiffs seek to raise five discovery issues, each consisting of a five-page  
9 joint letter brief. Plaintiffs identified and briefed those five issues in a 12.5 page discovery brief  
10 that Plaintiffs provided to Defendant on November 6 (“Five Disputed Issues”);

11 WHEREAS, without waiver of its objections or rights (including with respect to the  
12 propriety of splitting discovery issues into separate briefs and the timing of Plaintiffs’ letter  
13 briefing), and only with respect to the Five Disputed Issues, Defendant does not oppose filing a  
14 single combined letter brief in this instance instead of five separate ones; and

15 WHEREAS, for purposes of administrative efficiency, the parties agree to file one omnibus  
16 discovery letter brief addressing the Five Disputed Issues (“Omnibus Discovery Brief”) instead of  
17 filing five separate discovery letter briefs;

18 WHEREAS, to assist with the orderly exchange and finalization of the Omnibus Discovery  
19 Brief, the parties have agreed that rather than revising portions of their respective briefs after  
20 exchanging them, each side shall be permitted to put in a “Further Response” – not to exceed .5  
21 pages for each of the Five Disputed Issues (i.e. 2.5 additional pages, total, per side). The total  
22 length of the Omnibus Discovery Brief shall not exceed 30 pages.

23 IT IS HEREBY STIPULATED AND AGREED, by and through Plaintiffs and Defendant,  
24 that the parties shall file the Omnibus Discovery Brief totaling 30 pages (12.5 pages plus a 2.5 page  
25 “Further Response” per side), along with accompanying exhibits, on November 8, 2024.

Dated: November 8, 2024

Respectfully Submitted,

By: /s/ Bobby Ghajar

By: /s/ Maxwell V. Pritt

Bobby A. Ghajar  
Colette Ani Ghazarian  
**COOLEY LLP**  
1333 2nd Street, Suite 400  
Santa Monica, CA 90401  
Telephone: (310) 883-6400  
Facsimile: (310) 883-6500  
Email: bghajar@cooley.com  
cghazarian@cooley.com

David Boies (pro hac vice)  
David L. Simons (pro hac vice)  
**BOIES SCHILLER FLEXNER LLP**  
55 Hudson Yards, 20th Floor  
New York, NY 10001  
(914) 749-8200  
dboies@bsfllp.com  
dsimons@bsfllp.com

Mark R. Weinstein  
Elizabeth Lee Stameshkin  
**COOLEY LLP**  
3175 Hanover Street  
Palo Alto, CA 94304  
Telephone: 650-843-5000  
Facsimile: 650-849-7400  
Email: mweinstein@cooley.com  
Email: lstameshkin@cooley.com

Maxwell V. Pritt (SBN 253155)  
Joshua I. Schiller (SBN 330653)  
Joshua M. Stein (SBN 298856)  
44 Montgomery Street, 41st Floor  
San Francisco, CA 94104  
(415) 293-6800  
mpritt@bsfllp.com  
jischiller@bsfllp.com  
jstein@bsfllp.com

Kathleen R. Hartnett  
Judd D. Lauter  
**COOLEY LLP**  
3 Embarcadero Center, 20th Floor  
San Francisco, CA 94111-4004  
Telephone: (415) 693-2071  
Facsimile: (415) 693-2222  
Email: khartnett@cooley.com

Jesse Panuccio (pro hac vice)  
1401 New York Ave, NW  
Washington, DC 20005  
(202) 237-2727  
jpanuccio@bsfllp.com

Angela Dunning  
**CLEARY GOTTLIEB STEEN &  
HAMILTON LLP**  
1841 Page Mill Road, Suite 250  
Palo Alto, CA 94304-1248  
Telephone: (650) 815-4131  
Email: adunning@cgsh.com

Joseph R. Saveri (State Bar No. 130064)  
Cadio Zirpoli (State Bar No. 179108)  
Christopher K.L. Young (State Bar No. 318371)  
Holden Benon (State Bar No. 325847)  
Aaron Cera (State Bar No. 351163)  
**JOSEPH SAVERI LAW FIRM, LLP**  
601 California Street, Suite 1505  
San Francisco, California 94108  
Telephone: (415) 500-6800  
Facsimile: (415) 395-9940  
Email: jsaveri@saverilawfirm.com  
czirpoli@saverilawfirm.com  
cyoung@saverilawfirm.com  
hbenon@saverilawfirm.com  
acera@saverilawfirm.com

*Attorneys for Defendant*

*META PLATFORMS, INC.*

Amy Keller (pro hac vice)  
James A. Ulwick (pro hac vice)

1 Nada Djordjevic (*pro hac vice*)  
2 **DICELLO LEVITT LLP**  
3 10 North Dearborn St., Sixth Floor  
4 Chicago, Illinois 60602  
5 Telephone: (312) 214-7900  
6 akeller@dicellolevitt.com  
7 julwick@dicellolevitt.com  
8 ndjordjevic@dicellolevitt.com

6 David A. Straite (*pro hac vice*)  
7 **DICELLO LEVITT LLP**  
8 485 Lexington Ave., Suite 1000  
9 New York, NY 10017  
10 Telephone: (646) 933-1000  
11 dstraite@dicellolevitt.com

10 Matthew Butterick (State Bar No. 250953)  
11 1920 Hillhurst Avenue, 406  
12 Los Angeles, CA 90027  
13 Telephone: (323) 968-2632  
14 Facsimile: (415) 395-9940  
15 Email: mb@buttericklaw.com

14 Bryan L. Clobes (*pro hac vice*)  
15 Alexander J. Sweatman (*pro hac vice anticipated*)  
16 **CAFFERTY CLOBES MERIWETHER**  
17 **& SPRENGEL LLP**  
18 135 South LaSalle Street, Suite 3210  
19 Chicago, IL 60603  
20 Telephone: (215) 864-2800  
21 Email: bclobes@caffertyclobes.com  
22 asweatman@caffertyclobes.com

20 Daniel Jerome Muller  
21 **VENTURA HERSEY & MULLER, LLP**  
22 1506 Hamilton Avenue  
23 San Jose, CA 95125  
24 Telephone: (408) 512-3022  
25 Facsimile: (408) 512-3023  
26 Email: dmuller@venturahersey.com

25 *Counsel for Individual and Representative*  
26 *Plaintiffs and the Proposed Class*

**PROPOSED ORDER**

Pursuant to stipulation of the Parties, **IT IS SO ORDERED.** The Parties shall be permitted to file one omnibus discovery letter brief covering the Five Disputed Issues (as defined in the Stipulation) with 15 pages per side in accordance with the Stipulation, along with accompanying exhibits, on November 8, 2024.

DATED: November 15, 2024

  
HON. THOMAS S. HIXSON  
United States Magistrate Judge

**ECF ATTESTATION**

Pursuant to Local Rule 5-1(i)(3), I hereby attest that counsel for Plaintiffs concurs in the filing of this document.

/s/ Maxwell V. Pritt